

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH
CAROLINA**

DOCKET NO. 2019-186-E

IN THE MATTER OF:)	
)	
South Carolina Energy Freedom Act)	
(H.3659) Proceeding to Establish Duke)	
Energy Progress, LLC's Standard Offer,)	PETITION TO INTERVENE
Avoided Cost Methodologies, Form)	BY NUCOR STEEL –
Contract Power Purchase Agreements,)	SOUTH CAROLINA
Commitment to Sell Forms, and Any)	
Other Terms or Conditions Necessary)	
(Includes Small Power Producers as)	
Defined in 16 United States Code 796,)	
as Amended))	

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, LLC ("DEP"), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars a year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.
2. This docket has been established to address DEP's standard offer, avoided cost methodology, form contract power purchase agreements, commitment to sell forms, and other terms and conditions necessary as required by the South Carolina Energy Freedom Act. As a large industrial customer of DEP, Nucor has an interest in the topics that will be addressed in this proceeding, to the extent they could affect the cost, availability, and reliability of electric service to Nucor. Accordingly, Nucor has a stake in, and may be directly and substantially affected by, the outcome of this proceeding. Due to the

magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. Since 1987, Nucor has actively participated in many previous proceedings before this Commission. Nucor has not yet determined what its position may be in this proceeding.

3. Nucor's mailing address is:

Nucor Steel – South Carolina
P.O. Box 525
Darlington, SC 29532

4. Nucor will be represented in this proceeding by the firm Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC



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Dated: July 3, 2019

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This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail, fax or electronic mail on this the 3rd day of July, 2019:

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A handwritten signature in black ink, appearing to read "R. Smith, II". The signature is fluid and cursive, with a large initial "R" and a stylized "S".

Robert R. Smith, II